

# EXHIBIT G



**DIAMOND McCARTHY LLP**

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March 7, 2007

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**Via Electronic Mail**

Brian D. Vann, Esq.  
Sidley Austin, LLP  
1501 K Street, NW  
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Re: *In re Parmalat: PCFL vs. Bank of America*

In response to your letter to Allan Diamond of March 5, 2007, we disagree with your characterization of our offer to allow follow-up on reasonable requests for documents or information that may arise out of our client representative's recent deposition. We certainly did not agree to extend the fact discovery deadline for depositions of witnesses of whom the parties have long been aware. Plaintiffs listed Mr. Andrea Petrucci as one of only seven potential fact witnesses associated with Parmalat Capital Finance Limited back in February 2006 during the negotiations with defense regarding deposition time limits, and issues regarding his innocence have arisen several times in pleadings, documents, and depositions. Your new request on the day discovery ended that we produce him for a deposition is unreasonable and untimely. In any event, Mr. Petrucci is a third-party witness who is not within my client's control. Thus, we are unable to provide you with an opportunity to depose Mr. Petrucci.

Very truly yours,

A handwritten signature in black ink. It includes the name "Greg Taylor" and "by J. Benjamin Lee" above it, and "L. Ben Lee" below it.

Greg Taylor

cc: Kathy Puzone  
[kpuzone@stroock.com]